

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NAVIENT SOLUTIONS, LLC,

Plaintiff,

v.

KROHN & MOSS, LTD.; ADAM KROHN;
ADAM HILL; LAW OFFICES OF RYAN LEE,
PLLC; RYAN LEE; NATIONAL CONSUMER
ADVOCATES, INC.; DOUG JOHNSON;
MICHAEL BIANCONE; MB INVESTMENTS
& CONSULTING; JOHN DOES #1-20,

Defendants.

Case No. 1:17-cv-01178-LMB-TCB

STIPULATION OF PARTIAL DISMISSAL WITH PREJUDICE

Pursuant to Federal Rules of Civil Procedure 15(a)(2) and 41(a)(1)(A)(ii), Plaintiff Navient Solutions, LLC (“NSL”) dismisses defendants Krohn & Moss, Ltd., Adam Krohn, and Adam Hill (collectively, “K&M”) only, with prejudice, from all claims in the above-captioned action. All parties who have appeared in this action have joined in this stipulation of dismissal. In support of the partial dismissal, NSL states as follows:

1. NSL and K&M conducted a settlement conference in this case on March 7, 2018, which continued on March 19, 2018. In connection with the settlement conference, NSL and K&M entered into a confidential settlement agreement, which has been finalized and executed.

2. Pursuant to that confidential settlement agreement, NSL agreed to dismiss all claims against K&M in this action with prejudice. Therefore, NSL respectfully requests that the Court enter an Order dismissing this action with prejudice as to K&M only.

Dated: April 25, 2018

Respectfully submitted,

/s/ Jeffrey R. Hamlin

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2018, I caused a true copy of the foregoing to be served by email on the parties below:

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